

THE HONORABLE BARBARA ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

WILDWOOD TOWNHOMES OWNERS  
ASSOCIATION, a Washington Non-Profit  
Corporation,

Plaintiff,

v.

AMERICAN FAMILY MUTUAL  
INSURANCE COMPANY, S.I., a Wisconsin  
Company; and DOE INSURANCE  
COMPANIES 1-10,

Defendants.

No.: 2:21-cv-01080-BJR

STIPULATED MOTION AND ORDER  
FOR CONTINUING DISCOVERY  
CUTOFF

Plaintiff Wildwood Townhomes Owners Association (the “Association”) and  
Defendant American Family Mutual Insurance Company, S.I. (“AmFam”) stipulate to this  
motion for a continuance of the discovery cutoff and respectfully request a short extension of  
the discovery cutoff by five days.

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause  
and with the judge’s consent.” Good cause exists here because the parties are actively  
pursuing discovery in this matter but due to witness availability need a brief extension of the  
discovery cutoff to amicably schedule all necessary depositions. For purposes of judicial

economy, the parties propose that the discovery cutoff be continued pursuant to the below chart to enable both parties to complete the depositions of all witnesses. The parties respectfully request that the Court extend the currently scheduled deadline as set forth below. A proposed order is included herewith.

Event	Current Deadline	New Deadline
Discovery completed by	2/24/2023	3/1/2023

The Parties believe that there is good cause under Federal Rule of Civil Procedure 6(b) and Local Civil Rule 10(g) for a continuance of the discovery cutoff due to the reasons set forth above.

DATED: February 7, 2023

<p>Lane Powell PC</p> <p>By: <u>/s/Brian Kiolbasa</u>  Stephania Denton, WSBA #21920  dentons@lanepowell.com  Brian Kiolbasa, Admitted Pro Hac Vice  kiolbasab@lanepowell.com  Attorneys for American Family Mutual  Insurance Company, S.I.</p>	<p>Stein, Sudweeks &amp; Stein, PLLC</p> <p>By: <u>/s/Cortney Feniello</u>  Jerry H. Stein, WSBA #27721  jstein@condodeflects.com  Justin D. Sudweeks, WSBA #28755  justin@condodeflects.com  Daniel J. Stein, WSBA #48739  dstein@condodeflects.com  Cortney M. Feniello, WSBA #57352  cfeniello@condodeflects.com</p> <p>Attorneys for Plaintiff Wildwood  Townhomes Owners Association</p>
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**ORDER**

Based on the above Stipulated Motion, IT IS SO ORDERED that the discovery cutoff be extended as follows:

Event	Current Deadline	New Deadline
Discovery completed by	2/24/2023	3/1/2023

No other deadlines or events are altered.

IT IS SO ORDERED this 15th day of February, 2023.



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